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September 15, 2020

**VIA ECF & HAND DELIVERY**

Honorable Naomi Reice Buchwald  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 500 Pearl Street – Courtroom 21A  
 New York, NY 10007-1312

Re: *In re LIBOR-Based Financial Instruments Antitrust Litig.*, No. 11 Civ. 2613  
 (NRB), Master File No. No. 11 MD 2262 (NRB)

Dear Judge Buchwald:

As attorneys for the Exchange-Based Plaintiffs (“Plaintiffs”), we are respectfully submitting herewith for the Court’s consideration in connection with the fairness hearing scheduled to be held on September 17, 2020, [Proposed] Final Orders for Plaintiffs’ proposed settlements with Defendants Bank of America Corporation and Bank of America, N.A. (collectively, “BOA”), Barclays Bank plc (“Barclays”), Citigroup Inc., Citibank, N.A., and Citigroup Global Markets Inc. (collectively, “Citi”), Deutsche Bank AG, Deutsche Bank Securities Inc., and DB Group Services (UK) Ltd. (collectively, “Deutsche Bank”), HSBC Bank plc (“HSBC”), JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPMorgan”) and Société Générale (“SG”) (collectively “Settlements”). *See* Exhibits 1-6 hereto.

The enclosed proposed orders are the same as those previously submitted in connection with Plaintiffs’ Motion for Final Approval (ECF No. 3141) except: (1) the date of the fairness hearing (*i.e.*, September 17, 2020) in the first sentence of each proposed order has been filled in; and (2) the six opt-outs to the Settlements have been listed on Exhibit A to each proposed order.

Respectfully submitted,

/s/ Christopher Lovell

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*Interim Co-Lead Counsel for Exchange-Based Plaintiffs and the Proposed Class*

Encls.

cc: All Counsel of Record (via ECF)